

REMARKS

1. In response to the Office Action mailed October 7, 2003, Applicants respectfully request reconsideration. Claims 21-40 were last presented for examination in this application. In the Office Action, claims 21, 23, 24, 29, 38 and 40 were rejected and claims 22, 25-28, 30-37 and 39 were objected to. By the foregoing Amendments, claims 21, 22, 23, 24, 26, 27, 30-32, 34-38 and 40 have been amended. In addition, new claims 41-46 have been added, and no claims have been canceled. Thus, upon entry of this paper, claims 21-46 will be pending in this application. These amendments are believed not to introduce new matter and their entry is respectfully requested. Further, Applicants note that these amendments do not narrow the scope of the claims in any way.

2. Based on the above Amendments and following Remarks, Applicants respectfully request that all outstanding objections and rejections be reconsidered, and that they be withdrawn.

Claim Objections and Rejections Under 35 U.S.C. §112, second paragraph

3. Claims 23, 31 and 40 were objected to or rejected due to the inclusion of a number of informalities. By the foregoing amendments, these claims have been amended in accordance with the Examiner's suggestions. Accordingly, reconsideration and withdrawal of these objections and rejections is respectfully requested.

Examiner Interview

4. Applicants thank the Examiner for the courtesy extended to Applicants' undersigned representative in the telephonic interview conducted on December 1, 2003. In the interview the Examiner indicated that claims 23 and 40 would be in condition for allowance if the claims were amended to accommodate the section 112, second paragraph rejections. In addition, the Examiner indicated that claim 24 was rejected solely because of its dependency on rejected claim 23.

Allowable Subject Matter

5. Applicants note with appreciation the Examiner's indication that claims 22, 25-28, 30-37 and 39 recite allowable subject matter. As noted, claims 23, 24 and 40, as amended,

also recite allowable subject matter. Of these claims, claims 22-28, 30, 39 and 40 depend from rejected base claims which are patentable for at least the reasons set out below.

Claim Rejections

6. The Examiner has rejected claims 21 and 38 under 35 U.S.C. 102(e) as being anticipated by U. S. Patent No. 5,893,053 to Trueblood (hereinafter "Trueblood"). Based only on the following Remarks, Applicants respectfully request that the Examiner reconsider and withdraw these rejections.

7. In the noted rejections, the Examiner asserts that Trueblood's X-server communication daemon 58 is analogous to Applicants' claimed hooks module as recited in independent claim 21. Specifically, the Examiner asserts that Trueblood's tracking and control clients 60-66 are analogous to Applicants' graphics diagnostic tool. The Examiner further asserts that Trueblood's X-server communication daemon 58 is configured to attach Trueblood's clients 60-66 to portions of X-window 50 during normal operations of client application programs 26-30. The Examiner refers Applicants to column 4 lines 17-26, column 8 lines 20-51 and column 5 lines 3-41 of Trueblood in support of these contentions. Applicants respectfully disagree.

8. Trueblood neither discloses, teaches nor suggests Applicants' invention as recited in independent claims 21 and 38. Taking claim 21, for example, Trueblood neither discloses, teaches nor suggests "a hooks module for use in a computer graphics system... configured to attach the graphics diagnostic tool to predetermined portions of the computer graphics system during normal operations of the graphics application and without interruption to the normal operations of the graphics application." (See, Applicants' claim 21, above.)

9. Trueblood is directed to recording and playing back X-window data in a multimedia system (See, Trueblood, col. 4, lns. 9-14.) Trueblood's host workstation 12 contains application programs 26, 28 and 30 that display images on a display device 14. Workstation 12 includes a graphic controller card 33 having an X-server 34 and a graphics controller 36. The X-server 34 receives X-window commands from client applications 26-30 and converts them into device-specific actions which are interpreted by graphics controller 36. Graphics controller 36 then generates a raster file which is written into a frame buffer and ultimately displayed on display device 14. Similarly, recording/playback software 31 also included in workstation 12 receives X-window protocol commands from client programs 26-30, and forwards them to X-server 34 for processing to drive graphic controller 36. The

recording/playback software 31 intercepts the stream of X-protocol commands and copies them into a mass storage device 24 without interfering with the communications between client programs 26-30 and X-server 34. (See, Trueblood, Fig. 2, col. 4, ln. 16 – col. 5, ln. 7.)

10. In contrast to Applicants' claimed invention, Trueblood's recording/playback software 31 is always attached to the X-Window system 50. Trueblood's recording/playback software 31 includes an X-server communication daemon 58 which is interposed between client applications 26-30 and an X-window system 50 (in Figure 3, X-window system 50 includes the above-noted X-server 34, graphic controller 36, and display device 14). The X-server communication daemon 58 intercepts all X-protocol commands exchanged between the X-window system 50 and client application programs 26-30. X-server communication daemon 58 includes a number of tracking and control that clients 60, 62, 64, 66 that time stamp and record the noted X-window commands and internal events. (See, Trueblood, col, 5, lns. 23-42, col. 7, lns. 7-9.)

11. Trueblood's recording/playback software 31 is a permanent, continually-operating component of Trueblood's host workstation 12. Because it always has access to X-window system 50, there is no teaching or suggestion to attach the recording/playback software 31 to the X-window system 50. It is noted, in fact, that state tracking client 64 and event tracking client 66 capture all X-protocol commands and all cursor events, respectively. This continual and all-inclusive capturing of commands and events cannot occur unless Trueblood's recording/playback software 31 is provided continual access to X-window system 50. Thus, in contrast to Applicants' claimed hooks module, Trueblood's recording/playback software 31 does not "attach" tracking and control clients 60-66 to X-window 50.

12. It follows, then, that Trueblood also fails to teach or suggest the claimed attachment in the manner recited in independent claim 21, namely "during normal operations of a graphics application and without interruption to the normal operations of the graphics application." Trueblood, fails to teach or suggest attaching clients 60-66 to X-window system 50 at any time, let alone during normal operations of a graphics application as claimed. For at least these reasons, Applicants assert that Applicants' invention as recited in claim 21 is neither disclosed, taught nor suggested by Trueblood. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw this rejection of claim 21.

13. Independent claim 38 is directed to a computer graphics system comprising "a hooks module integrated within a computer graphics system for dynamically attaching a graphics diagnostic tool to at least one selected portion of the computer graphics system while a

graphics application is executing on the graphics system, and without interrupting the execution of the graphics application. For at least the reasons noted above, Applicants respectfully assert that Trueblood neither discloses, teaches nor suggests dynamically attaching a graphics diagnostic tool ... while a graphics application is executing on the graphics system" as recited in claim 38. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 38.

Dependent Claims

14. The dependent claims incorporate all of the subject matter of their respective independent claims and add additional subject matter which makes them a fortiori and independently patentable over the art of record. Accordingly, Applicants respectfully request that the outstanding rejections of the dependent claims be reconsidered and withdrawn.

Conclusion

15. It is believed that this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after entering this paper into the record, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' representative at the number provided below.

Respectfully submitted,

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